UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 24, 2010

Ms. Mary Beth Adams
NEPA Coordinator
Timber and Watershed Laboratory
P. O. Box 404
Parsons, WV 26287

Re: Draft Environmental Impact Statement, Fernow Experimental Forest, Tucker County, WV, April 2010 CEQ # 20100117

Dear Ms. Adams:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Fernow Experimental Forest, Parsons, WV. EPA has assigned this DEIS a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

Purpose and Need:

The purpose and need should be clearly stated in chapter 1. The information provided in this section does not provide a clear statement of what is needed. Page 1-4 states that most of the proposed actions are ongoing research studies. "We want to continue these experiments as designed, and continue to glean information about the effects of various silviculture practices on forest ecosystems in the central Appalachians.

In addition, Page 1-4 states that EAs have been prepared on a yearly basis on the Monongahela National forest for similar projects involving timber harvest. A determination was made that the effects of timber harvesting and connected actions from those projects were not significant." Additional information should be provided to explain these statements.

Alternatives:

The DEIS considers two alternatives in detail: Alternative A- No Action and Alternative B- Proposed Action. The proposed action includes many projects that are repeat treatments in ongoing long-term research. The proposed action involves using the following silivicultural treatments in existing research studies: diameter-limiting cutting treatment on 93.9 acres, single tree selection on 114.3 acres, financial maturity harvesting method on 214.5 acres, group selection on 7.9 acres, 12.0 acres of patch clear cutting, and prescribed fire treatment of 420.4

acres. Other treatments include fertilization of 96.7 acres with ammonium sulfate fertilizer, (and additions of dolomitic lime to 4 of those acres), herbicide treatment of selected tress on 7.5 acres, and treatments of invasive exotic plants (approximately 12 acres total), and maintenance of roads, decks, and other infrastructure. Page 1-4 –Management activities include: applying gravel to road surfaces as needed, replacing culverts on skid roads and haul roads as needed, maintaining water bars on skid roads, maintaining ditches and culverts, seeding decks and landings, using herbicides to control the spread of Japanese stiltgrass on approximately 12 acres, and other invasives such as tree-of heaven on an individual tree basis, as needed.

Additional information should be provided describing the span of these projects, how the data is used and where it is presented, if there are conclusions to these studies, if there are ever modifications and how that is determined. We suggest adaptive management techniques be considered.

Affected Environment and Environmental Effects:

Page 3-1 defines perennial and nonperennial channels. While flow is an indicator of stream type, the flow may be influenced by a variety of factors. Other methods to define stream types, such as benthic macro invertebrate populations, should be considered.

It is unclear if the downstream extent of project-related impacts is monitored. It is also unclear if these studies are impacting benthic macroinvertebrate and fish populations in the project vicinity and downstream. For example, loss of leaf litter in an upstream portion may impact aquatic life downstream. The EIS should evaluate these types of impacts. These types of impacts should be evaluated from a cumulative impact point of view as well. If these impacts occur in a few subdrainages there may be impacts to larger water bodies.

We recommend that the Forest Service work with the US Fish and Wildlife Service and other agencies regarding state and federal listed species. Coordination letters should be provided in the EIS.

Details of stream monitoring should be provided as well as steps taken if the monitoring indicates there are issues that need to be addressed. Every effort should be made to avoid and minimize impacts to the environment.

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,

Barbara Rudnick
NEPA Team Leader

Enclosure